

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

	X	
	:	
PRECISION MEDICINE GROUP, LLC, et al.,	:	
	:	Case No.: 1:20-cv-02974(PGG)
Plaintiffs,	:	
against.	:	
	:	MOTION TO FILE EXHIBITS
	:	UNDER SEAL
BLUE MATTER LLC, et al.,	:	
	:	
Defendants.	:	
	:	
	:	
	X	

Defendants Naina Ahmad and Jose Jauregui respectfully submit this motion to file under seal their employment agreements and the employment agreement of Mridul Malhotra as exhibits to a letter to be filed with the Court concerning their proposed motion to dismiss the complaint.

Plaintiffs' complaint quotes extensively from Defendants' employment agreements and Plaintiffs failed to file the complaint under seal, thereby waiving the right to assert confidentiality over such documents. Nevertheless, out of an abundance of caution, Ahmad and Jauregui respectfully request the Court's permission to file such agreements under seal. Ahmad and Jauregui reserve the right to move to unseal these documents at the appropriate time.

Dated: June 15, 2020

Respectfully submitted,

/s/ Wendy R. Stein

Wendy R. Stein

Paul A. Saso

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GIBBONS P.C.

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Attorneys for Defendants

Naina Ahmad, Mridul Malhotra and Jose Jauregui